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May 14, 2015

## VIA U.S. MAIL

National Freedom of Information Officer U.S Environmental Protection Agency 1200 Pennsylvania Avenue, NW (2822T) Washington, DC 20460 (202) 566-1667

Re: Freedom of Information Act Request

Dear Public Records Coordinator:

Pursuant to the California Public Records Act, California Government Code sections 6250 *et seq.* (the "Act"), we make the following requests for documents. Within ten (10) days, please provide an initial determination as to whether the County of Santa Clara Department of Environmental Health ("County") possesses public records responsive to this request. (Gov't Code § 6253(c).) As required by the Act, please state in your initial determination the estimated date and time the County will make these records available to Gordon & Rees LLP for review. (Gov't Code § 6253(c).)

If you choose to deny any part of this request, please cite the specific statutory exceptions upon which your denial is based. (Gov't Code § 6255.) If a document is withheld, please provide the following information:

- 1. the date of the document;
- 2. the general nature of the document;
- 3. the identity of the author;
- 4. the identity and title of the recipient(s), including those who may have received "blind" copies; and
- 5. the specific reason(s) why the document is being withheld.

In addition, where only a portion of a record is subject to a statutory exception, please provide the reasonably segregable remaining portion of the document for review. (Gov't Code § 6253(a).)

## **Definitions**

1. As used in this request, "document" shall mean "writing" as that term is defined by Government Code section 6252(f). Thus, "document" means:

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[H]andwriting, typewriting, printing, photostatting, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combination thereof, an any record created, regardless of the manner in which the record has been stored.

(Gov't Code § 6252(g).)

- 2. As used in this request, "pertaining to" shall mean describing, evidencing, proving, tending to prove, mentioning, containing, concerning, opining about, commenting upon, analyzing, or otherwise discussing directly or indirectly.
- 3. As used in this request, "the Properties" shall mean the address 10100 Bubb Road, Cupertino, California; 10131 Bubb Road, Cupertino; and 10420 Bubb Road, Cupertino.

## **Documents Requested**

- 1. All documents pertaining to the Properties from 1967 through 1992.
- 2. All documents pertaining to Hanggi Manufacturing, a prior operator at the Properties dated 1976 through 1992.
- 3. All documents pertaining to Versatec, a prior operator at the Properties dated 1967 through 1976.

Please do not hesitate to contact me if you require clarification or have any questions. Please also contact me when all responsive documents are available for review and, after review, we will pay the cost of duplication.

Best regards,

GORDON & REES LLP

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